

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)

)

CC Docket No. 95-72

End User Common Line Charges)

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REPLY

U S WEST Communications, Inc. ("U S WEST"), through counsel and pursuant to the Federal Communications Commission's ("Commission") Public Notices,¹ hereby replies to comments filed by GTE Service Corporation and its affiliated domestic telephone operating companies ("GTE") and MCI Telecommunications Corporation ("MCI")² on the non-traffic sensitive ("NTS") cost data submitted by the former Bell Operating Companies ("BOC") for single and multi-channel services. The Commission requested these data submissions as an aid in determining how end user common line ("EUCL") charges should be applied to multi-channel services. The impetus for this data request was U S WEST's earlier comments suggesting that a reasonable way to apply EUCL charges to multi-channel services would be on the basis of relative NTS costs (i.e., the ratio of

¹ Public Notices, Pleading Cycle Established for Comments on Non-Traffic-Sensitive Cost Data Submitted by the BOCs, DA 95-2089, rel. Oct. 2, 1995; Pleading Cycle Amended for Comments on Non-Traffic-Sensitive Cost Data Submitted by the BOCs, DA 95-2148, rel. Oct. 11, 1995.

² GTE and MCI filed comments herein October 30, 1995.

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NTS costs for multi-channel services to single channel services).³ In commenting on BOC data submissions, GTE and MCI opposed the NTS cost ratio approach and advocated applying one EUCL charge per facility.⁴

One thing is clear from the data filed by the BOCs and the comments of GTE and MCI. Regardless of whether EUCL charges are determined on the basis of NTS costs or assessed per facility, the answer is the same for Basic Rate Integrated Services Digital Network ("ISDN") service. That is, only one EUCL charge should be levied on Basic Rate ISDN service. There is no such unanimity among the parties with respect to the appropriate EUCL charge for Primary Rate ISDN nor the NTS costs associated with provisioning it.

Rather than prolonging the uncertainty and delaying a decision on the application of EUCL charges to multi-channel services, the Commission should bifurcate the issue. It should issue an interim order finding that Basic Rate ISDN service should bear no more than a single EUCL charge and continue its investigation on the appropriate level of EUCL charges for other multi-channel services, including Primary Rate ISDN. This approach would remove a major deterrent for customers considering the purchase of Basic Rate ISDN service. Such an approach would further the public interest by removing regulatory uncertainty

³ U S WEST Comments filed herein June 29, 1995. These Comments were filed in response to the Commission's Notice of Proposed Rulemaking which requested comment on several different alternative ways of determining EUCL charges for multi-channel services. In the Matter of End User Common Line Charges, Notice of Proposed Rulemaking, 10 FCC Rcd. 8565 (1995).

⁴ GTE at 11; MCI at 1.

and making advanced telecommunication services more widely available to the public.

Respectfully submitted,

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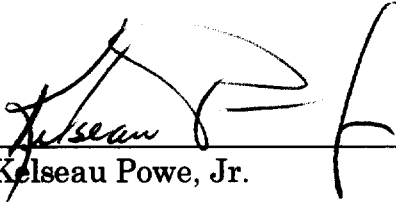
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Of Counsel,
Dan L. Poole

November 6, 1995

CERTIFICATE OF SERVICE

I, Kelseau Powe, Jr., do hereby certify that on this 6th day of November, 1995, I have caused a copy of the foregoing **REPLY** to be served via first-class U.S. Mail, postage prepaid, upon the persons listed on the attached service list.


Kelseau Powe, Jr.

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